

Data Protection Notice for Saverto's Whistleblower Protection System

The following information informs you about the collection, processing, and use of personal data within the framework of Saverto's Whistleblower Protection System – i.e., how your personal data is handled if you submit a report by email, telephone, letter, or in person. We ask you to read this data protection notice.

1. Purpose of the Whistleblower Protection System and Legal Basis for Data Processing

The Whistleblower Protection System is intended to ensure that reports of (suspected) violations of the law or serious internal regulations are received and processed confidentially and securely.

The processing of personal data within the framework of the whistleblower protection system is based on the following legal bases:

- Compliance with a legal requirement (Art. 6 (1) (c) GDPR). The EU Whistleblower Directive requires Saverto to implement a whistleblower protection system to enable employees or third parties to securely transmit information about legal violations within the company.
- Saverto's legitimate interest in uncovering and preventing malpractice and the associated averting of damages and liability risks (Art. 6 (1) (f) GDPR).

Data processing also serves to prevent criminal offenses or other legal violations in connection with an employment relationship if a received tip concerns a Saverto employee.

The processing of personal data is based on consent (Art. 6 (1) (a) GDPR), which is given by the fact that the tip can also be submitted anonymously.

- Consent to data processing can generally be revoked at any time.
- However, in practice, a revocation period of one month can generally be assumed. This is because, in certain cases, Saverto is obligated under Art. 14 (3) (a) GDPR to inform the data subject of the allegations made against them and the investigations conducted within one month. This reporting obligation covers the storage, the type of data, the purpose of the processing, the identity of the controller, and – where legally required – the reporting party, so that termination of data processing and deletion of identification data is then no longer feasible.
- The revocation period can also be shortened if, for example, the nature of the report requires the immediate involvement of an authority or court.

2. Data processing procedure

The use of the whistleblower protection system by the reporting party is voluntary.

Saverto collects the following personal data when a report is submitted:

- Your name (if you disclose your identity),

- Your contact details (if you provide them to us),
- The fact that you have submitted a report through the whistleblower protection system,
- That you are employed by a Saverto company,
- Any names and other personal data of the individuals listed in the report.

The data submitted to the whistleblower system is encrypted, so access is limited to a small circle of explicitly authorized Saverto employees. These authorized employees review the reported matter and, if necessary, conduct further case-specific investigations.

- However, confidentiality cannot be guaranteed if false information is knowingly submitted, e.g., with the aim of discrediting a person (denunciation).
- In certain cases, Saverto is obliged under data protection law to inform the affected person of the allegations made against them. This is required by law if it is objectively established that providing information to the affected person can no longer compromise the specific investigation into the tip. In doing so, your identity as the reporting party will not be disclosed – as far as legally possible – and it will also be ensured that no conclusions about your identity can be drawn.

As part of the report processing or an investigation, it may be necessary to pass on information to other employees of Saverto's subsidiaries, for example, if the information relates to events within subsidiaries.

Saverto always ensures that the relevant data protection regulations are observed when passing on information. If there is a corresponding legal obligation or data protection requirement for the investigation of the tip, further possible recipient categories include law enforcement authorities, antitrust authorities, other administrative authorities, courts, and international law and auditing firms commissioned by Saverto. Any person who receives access to the data is obliged to maintain confidentiality.

Saverto will retain personal data for as long as necessary for the investigation and final assessment, as long as Saverto has a legitimate interest, or as long as a legal requirement exists. After that, this data will be deleted in accordance with the relevant legal requirements. The storage period depends in particular on the severity of the suspicion and the reported potential breach of duty.

3. Your Rights

Under EU data protection law (EU GDPR), you and the persons named in the tip have the right to:

- access,
- correction,
- deletion,

- restriction of the processing of your personal data, and in certain cases, the right to data portability.

In addition, you may object to the processing of your personal data for reasons arising from your particular situation, provided that the data processing is carried out in the public interest or on the basis of a balance of interests. The assertion of your data subject rights and the filing of an objection can be made informally by email or post.

Your request will generally be processed within one month, and you will be informed of the measures taken. If the right of objection is exercised, we will immediately check to what extent the stored data is still required, in particular for processing a notification. Data that is no longer required will be deleted immediately. If data is necessary for the assertion, exercise, or defense of legal claims or for the fulfillment of contractual obligations, the request for deletion can only be processed after the mandatory reasons for storage no longer apply.

4. Your contact persons

The contact person for data protection matters is the Legal Department.